

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

**JORDAN AMLIN nka JORDAN
HAMMOND,**

Plaintiff,

vs.

KULDEEP SINGH, *et al.*,

Defendants.

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CASE NO.: 3:21-cv-230

Judge:

NOTICE OF REMOVAL

Defendants, Kuldeep Singh and BSR Xpress, LLC, by their attorneys, hereby file this notice of removal of Case No.: 2021 CV 02948 from the Court of Common Pleas of Montgomery County, Ohio, to the United States District Court for the Southern District of Ohio, Western Division. In support, Defendants, state as follows:

1. Plaintiff initiated this action by filing a complaint against Defendants, Kuldeep Singh and BSR Xpress, LLC, on July 21, 2021, in the Court of Common Pleas of Montgomery County, Ohio, Case No.: 2021 CV 02948, styled *Jordan Amlin nka Jordan Hammond v. Kuldeep Singh, et al.*, (hereinafter “state court action”). According to the state court docket, Defendant, Kuldeep Singh was served less than thirty days ago, on July 26. Service was by FedEx delivery. A copy of the service record is attached as Exhibit A.
2. A copy of the Complaint and a copy of the Summons, the only pleadings filed in the state court action and served on Defendant, are attached hereto as Exhibits B and C, respectively.
3. The state court action is a controversy between citizens of different states, and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs. This is evidenced by the

Complaint wherein Plaintiff stated four counts and prayed for a sum in excess of \$25,000 on each count.

a. The complaint alleges Plaintiff is a resident of Columbus, Ohio, and, therefore, for diversity purposes, Plaintiff is a citizen of the State of Ohio.

b. BSR Xpress, LLC, is a limited liability company organized and existing under the laws of the State of Indiana, with its principal place of business in that state. The sole member of the LLC, Bhajneek S. Rangi, is a resident of the State of Indiana and, therefore, for diversity purposes, BSR Xpress, LLC, is a citizen of the State of Indiana and not a citizen of the State of Ohio.

c. Kuldeep Singh is a resident of Fishers, Indiana, and, therefore, for diversity purposes, he is a citizen of the State of Indiana, and not the State of Ohio.

d. This is a civil action brought in state court, over which the United States District Court has original jurisdiction because of both diversity of citizenship and an amount in controversy in excess of \$75,000.00, exclusive of interest and costs, under 28 USC section 1332. In this action, Plaintiff seeks damages for bodily injury.

4. The state court action is one that may be removed to this Court, and this notice of removal is filed pursuant to 28 USC sections 1441 and 1446, within thirty days of service of the complaint upon Defendant, Kuldeep Singh. BSR Xpress, LLC, has not been served and, according to the state court docket, no summons has been issued to it.

5. A copy of this notice of removal will be served on Plaintiff's attorney and a notice of filing of this notice of removal will be filed with the Court of Common Pleas of Montgomery County, Ohio. A copy of the notice to the Court of Common Pleas of Montgomery County, Ohio, is attached as Exhibit D.

WHEREFORE, Defendants, Kuldeep Singh and BSR Xpress, LLC, pray that this notice of removal be filed, that Case No.: 2021 CV 02948 from the Court of Common Pleas of Montgomery County, Ohio, be removed to and proceed in this Court, and that no further proceedings be had in the Court of Common Pleas of Montgomery County, Ohio.

Respectfully submitted,

Garvey Shearer Nordstrom, PSC

/s/ David W. Zahniser

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CERTIFICATE OF SERVICE

I certify that on the 24th day of August, 2021, a copy of this pleading was e-mailed to counsel of record, and the pleading was electronically filed using the court's electronic filing system, which system will send notification of filing, if they are participants, to the following:

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